



September 14, 2006

Reply to Attn of: DL: 200-12

TO: Distribution

FROM: DL/Chief Counsel

SUBJECT: Determination Regarding the Attendance by NASA Employees at the Silicon Valley Leadership Group Annual CEO and Board of Directors Barbecue on September 15, 2006

The Silicon Valley Leadership Group (SVLG) will hold its annual CEO and Board of Directors Barbecue at the private residence of one of the SVLG Board Members. The SVLG is organized to involve principal officers and senior managers of member companies in a cooperative effort with local, regional, state, and federal government officials to address major public policy issues affecting the economic health and quality of life in Silicon Valley. One hundred of Silicon Valley's top CEOs and other senior officers as well as thirty to forty elected officials have been invited to this event. The estimated cost of the barbecue dinner is valued at approximately \$50 to \$55 per person.

I find this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend the event. NASA employees will have the opportunity to discuss public policy issues and other related matters with senior representatives of corporations in the Silicon Valley and elected officials. Accordingly, NASA employees whose duties do not substantially affect SVLG, or a majority of all of its members, may accept an invitation for themselves for free attendance at the barbecue.

NASA employees whose duties may substantially affect SVLG, or a majority of all of its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 CFR § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

In the event that trinkets or other mementos are distributed at the event, attendees are reminded of the \$20 gift exception at 5 CFR § 2635.204(a) which provides that employees may accept gifts for themselves (and family members) valued at no more than \$20 per occasion. NASA invitees are reminded not to exceed the \$50 cap on gifts from SVLG in a calendar year.


Sally O. Mauldin

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Associate Administrator/Mr. Geveden

Chief of Staff/Mr. Morrell

Deputy Chief of Staff and White House Liaison/Mr. Jezierski

Assistant Administrator for Security and Program Protection/Mr. Saleeba

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- Assistant Administrator for Diversity and Equal Opportunity/Dr. Hayden-Watkins
- Assistant Administrator for Human Capital Management/Ms. Dawsey
- Assistant Administrator for Infrastructure and Administration/Ms. Dominguez (Acting)
- Assistant Administrator for Procurement/Mr. Luedtke
- Assistant Administrator for Small and Disadvantaged Business Utilization/Mr. Balinskas (Acting)
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cc:

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